



# Corporate Audit Policies – How to Maximize Value

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# Introductions



## Brian Wanzenried, P.E.

- Director of Environmental for the Gavilon Group
- Chemical and environmental engineer
- 27 years of professional environmental, health, and safety experience

## Robin Fried, CHMM, CPEA

- Senior Consultant for Tellevate
- Certified professional environmental and management system auditor
- 12 years of professional environmental, health, and safety experience

# Gavilon Grain Overview



**125 Grain Elevator and Processing Facilities**

**1900 Employees**

**3 Full-Time Environmental Staff**

## **Environmental Aspects**

- Air Permits
- Spill Prevention Control and Countermeasure
- Pesticide Management
- Stormwater
- Universal Waste



# Gavilon's Audit History



## Why Audit?

- Verify compliance
- EMS requirements
- EPA audit privilege
- DOJ effective compliance program

## Other Challenges and Considerations

- Limited time and resources
- No environmental staff at each site

# Gavilon's Internal Audit Program



## Gavilon's Audit Objectives

- Improve internal programs
- Increase program visibility and communication with each location
- Provide training and technical support

## Other Audit Objective:

- Address findings
- Build relationships
- Collect data



# Gavilon's Internal Audit Program



## Who?

- Gavilon Environmental Department and Tellevate
- Gavilon owned and/or operated grain elevators
- Facility superintendents and managers

## What?

- Environmental regulatory requirements
- Internal program requirements

# Gavilon's Internal Audit Program



## When?

- Each grain elevator location
- Once every 3 years
- Covers a period going back 5 years



# Gavilon's Audit Approach



## Selecting an Auditor/Audit Team

- Independent
- Impartial and objective
- Truthful and accurate
- Confidential



**When does it make sense to conduct the audit internally vs having a contractor do it?**



# Gavilon's Audit Approach



## Evidence-Based Approach

- Reliable and reproducible results
- Verifiable
- Based on available information

## Feasibility

- Information availability
- Cooperation with staff
- Adequate time and resources
- Combining locations

# Gavilon's Audit Approach



## Audit Protocols

- Internal Gavilon environmental checklist
- Federal and State regulations
- Internal requirements



# Gavilon's Audit Approach



## Information Technology Tools

- Intelex
- SharePoint
- Google Earth



# Gavilon's Audit Approach



## Other Resources

- Top management support
- Financial
- Travel
- Communication
- Documentation



# Gavilon's Audit Process



## Pre-audit activities

- Pre-audit call and questionnaire
- Audit plan and schedule
- Document review

## Conducting the on-site audit

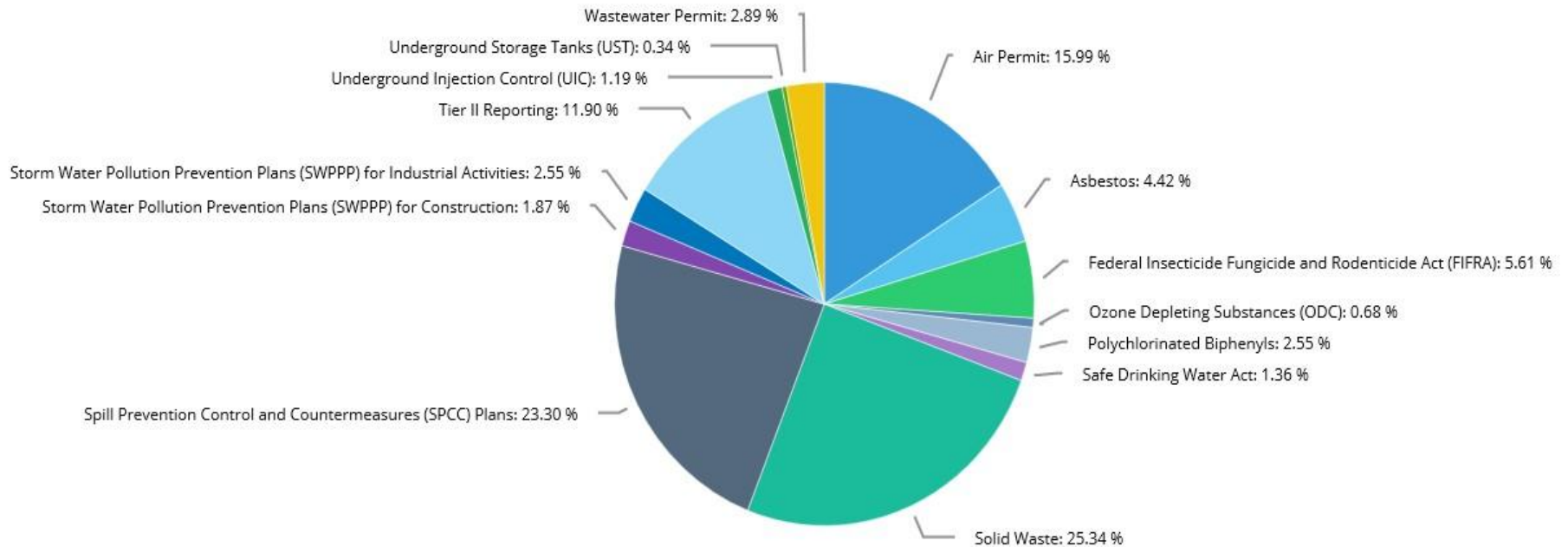
- Opening meeting
- Collection information and generating findings
- Closing meeting

## Post-audit activities

- Report generation
- Technical assistance and follow-up

# Audit Results

Environmental Compliance Assessment Findings by Section



## Top 3 Environmental Compliance Assessment Findings

- Solid Waste 25.34%
- SPCC 23.30%
- Air Permit 15.99%



# Audit Benefits



## Positive Impacts

- Scoring system
- Improved awareness and communication
- Staff training and confidence
- Better compliance

## Lessons Learned

- Internal environmental checklist improvements
- Corrective action tracking
- Coordinate schedules

# Going Forward



## Continual Improvements

- “Get into the weeds”
- Focus on root cause
- Update the EMS
- More technical assistant





# Key Take Aways



## Key things that will maximize your audit program's value

- Top management support
- Established objectives
- Experienced and independent audit team
- Planning and communication
- Documentation
- Corrective action tracking

# QUESTIONS?

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